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VIA EMAIL ONLY: erik.s.siebert@usdoj.gov; shea.gibbons@usdoj.gov

RE: *United States v. Moore*, 3:21cr42

Dear Erik and Shea,

June 16, 2022

This letter is to notify you that in addition to Dr. Eli Coston—whose report and Curriculum Vitae and the data underlying Dr. Coston's report and related articles and materials the defense has already provided to you, the defense intends to call an expert historian at the hearing on the pending motions in this case scheduled to begin on June 27, 2022.

Dr. Marvin Chiles is an Assistant Professor of African American History at Old Dominion University in Norfolk, Virginia. Dr. Chiles has specific expertise in the history of policing, politics, and racial segregation in Richmond, Virginia. He has published several peer-reviewed journal articles on these topics. Dr. Chiles will testify about the history of policing in Richmond, and specifically the history of the Richmond Police Department. Dr. Chiles will testify about the political history of Richmond and how that history influenced policing in Richmond. Dr. Chiles will also testify about the history of racial segregation and racial politics in Richmond and how that history has shaped the current racial segregation of residents in Richmond.

The defense engaged Dr. Chiles only last week. We will be providing materials related to his testimony by providing you access to a folder on box.com entitled "United States v. Moore—government." If you do not already have a free box.com account, please use your email addresses listed above to create one at <https://account.box.com/signup/personal?tc=annual>. We will notify you if we upload any additional materials to that box.com folder beyond the materials currently loaded

there.

We believe these disclosures comply with our disclosure obligations pursuant to Federal Rule of Criminal Procedure 16 and Federal Rule of Evidence 702 et seq. If you believe there is additional information to which you are entitled, please let us know at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura J. Koenig', with a stylized flourish at the end.

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